

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:)	Chapter 11
PES HOLDINGS, LLC, <i>et al.</i> ,)	Case No. 19-11626 (LSS)
Debtors.)	(Jointly Administered)
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PES HOLDINGS, LLC, <i>et al.</i> ,)	
Plaintiffs,)	
-and-)	Adversary Proceeding
ICBC STANDARD BANK PLC,)	
Intervenor-Plaintiff)	
v.)	Case No. 20-50454 (MFW)
ALLIANZ GLOBAL RISKS US INSURANCE)	
CO., <i>et al.</i> ,)	
Defendants.)	

**MOTION TO STRIKE PORTIONS OF THOMAS BRINDLEY’S REPORTS AND TO
PRECLUDE HIS TESTIMONY ON CERTAIN TOPICS**

Pursuant to Federal Rules of Evidence 403 and 702, made applicable to this adversary proceeding under Rule 9017 of the Federal Rules of Bankruptcy Procedure, Insurers,¹ the defendants in this adversary proceeding, respectfully move to strike portions of Thomas Brindley's

¹ The Insurers submitting this Motion are listed on Annex 1 attached hereto.

Reports and to preclude his testimony on certain topics. The grounds for this motion are fully set forth in the Memorandum of Law filed contemporaneously herewith.

Dated: November 12, 2021

HOGAN MCDANIEL

/s/ Garvan F. McDaniel
Garvan F. McDaniel [Del. Bar No. 4167]
1311 Delaware Avenue
Wilmington, Delaware 19806
Telephone 302-656-7540
gmcDaniel@dkhogan.com

-and

**WILMER CUTLER PICKERING HALE
AND DORR LLP**

Philip D. Anker
7 World Trade Center
250 Greenwich Street
New York, NY 10007
Telephone: 212-230-8890
philip.anker@wilmerhale.com

Benjamin W. Loveland
60 State Street
Boston, MA 02109
Telephone: 617-526-6000
benjamin.loveland@wilmerhale.com
Counsel for Defendant Insurers

-and-

ZELLE LLP

Jonathan R. MacBride
1635 Market Street, Suite 1600
Philadelphia, PA 19103
Telephone: 484-532-5330
jmacbride@zelle.com

Matthew Gonzalez
45 Broadway, Suite 920
New York, NY 10006
Telephone 646-876-4410

mgonzalez@zelle.com
Co-Counsel for Defendant Insurers